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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2010-54

13 **DEBORAH KATHLEEN BLAZE**
528 Peach Drive
Chowchilla, California 93610

OAH No. 2009100105

14 **Registered Nurse License No. 544432**

**FIRST AMENDED
ACCUSATION**

15 Respondent.

16
17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her
20 official capacity as the Interim Executive Officer of the Board of Registered Nursing ("Board"),
21 Department of Consumer Affairs.

22 **Registered Nurse License**

23 2. On or about June 29, 1998, the Board issued Registered Nurse License Number
24 544432 to Deborah Kathleen Blaze ("Respondent"). The registered nurse license was in full
25 force and effect at all times relevant to the charges brought herein and will expire on December
26 31, 2011, unless renewed.

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STATUTORY PROVISIONS

3. Section 2750 of the Business and Professions Code ("Code") provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with Code section 2750) of the Nursing Practice Act.

4. Code section 2764 provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under Code section 2811, subdivision (b), the Board may renew an expired license at any time within eight years after the expiration.

5. Code section 118, subdivision (b), provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

6. Code section 2761 states, in pertinent part:

The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

(a) Unprofessional conduct . . . ,

(f) Conviction of a felony or any offense substantially related to the qualifications, functions, and duties of a registered nurse, in which event the record of the conviction shall be conclusive evidence thereof.

7. Code section 2762 states, in pertinent part:

In addition to other acts constituting unprofessional conduct within the meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed under this chapter to do any of the following:

(a) Obtain or possess in violation of law, or prescribe, or except as directed by a licensed physician and surgeon, dentist, or podiatrist administer to himself or herself, or furnish or administer to another, any controlled substance as defined in Division 10 (commencing with Section 11000) of the Health and Safety Code or any dangerous drug or dangerous device as defined in Section 4022...

(c) Be convicted of a criminal offense involving the prescription, consumption, or self-administration of any of the substances described in subdivisions (a) and (b) of this section, or the possession of, or falsification of a record pertaining to, the substances described in subdivision (a) of this section, in which event the record of the conviction is conclusive evidence thereof.

1 8. Code section 4060 states, in pertinent part:

2 No person shall possess any controlled substances, except that furnished
3 to a person upon the prescription of a physician, dentist, podiatrist, optometrist,
4 veterinarian, or naturopathic doctor....

5 9. Health and Safety Code section 11173, subdivision (a) provides that no person
6 shall obtain or attempt to obtain controlled substances, or procure or attempt to procure the
7 administration of or prescription for controlled substances, (1) by fraud, deceit, misrepresentation,
8 or subterfuge; or (2) by the concealment of a material fact.

8 COST RECOVERY

9 10. Code section 125.3 provides, in pertinent part, that the Board may request the
10 administrative law judge to direct a licensee found to have committed a violation or violations of
11 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
12 enforcement of the case.

13 11. **DRUGS**

14 "Phentermine" is a Schedule IV controlled substance as defined by Health and
15 Safety Code section 11057, subdivision (d)(2) and a dangerous drug pursuant to Code section
16 4022, in that it requires a prescription under state and federal laws.

17 "Vicodin" is a trade name for hydrocodone and is Schedule III controlled substance
18 as defined in Health and Safety Code section 11056, subdivision (e) and a dangerous drug
19 pursuant to Code section 4022, in that it requires a prescription under state and federal laws.

20 "Augmentin" is a dangerous drug pursuant to Code section 4022, in that it requires a
21 prescription under state and federal laws.

22 FIRST CAUSE FOR DISCIPLINE

23 (Obtained and Possessed Controlled Substances in Violation of Law;

24 Self-Administered)

25 12. Respondent is subject to discipline under Code section 2761, subdivision (a), on the
26 grounds of unprofessional conduct, as defined by Code section 2762, subdivision (a), in that from
27 approximately April 8, 2005, to July 6, 2006, while on duty as a registered nurse at Chowchilla
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1 Hospital and Medical Center, Chowchilla, California, Respondent, by her own admission,
2 committed the following acts:

3 a. Respondent obtained the controlled substance Phentermine by fraud, deceit,
4 misrepresentation or subterfuge by taking the drugs from hospital supplies in violation of Health
5 and Safety Code section 11173, subdivision (a).

6 b. Respondent possessed the controlled substance Phentermine in violation of Code
7 section 4060.

8 c. Respondent self-administered the controlled substance Phentermine without lawful
9 authority.

10 **SECOND CAUSE FOR DISCIPLINE**

11 **(Self-Administered a Controlled Substance without Lawful Authority)**

12 13. Respondent is subject to discipline under Code section 2761, subdivision (a), on the
13 grounds of unprofessional conduct, as defined in Code section 2762, subdivision (a), in that in or
14 about July 2008, while licensed as a registered nurse, Respondent self-administered the controlled
15 substance Vicodin, without lawful authority, as evidenced by a positive drug screen obtained by
16 the Division of Investigation on or about July 15, 2008.

17 **THIRD CAUSE FOR DISCIPLINE**

18 **(Obtained, Possessed, and Self-Administered Dangerous Drug in Violation of Law)**

19 14. Respondent is subject to discipline under Code section 2761, subdivision (a), on the
20 grounds of unprofessional conduct, as defined by Code section 2762, subdivisions (a) and (c), in
21 that on or about May 23, 2005, while on duty as a registered nurse, Respondent, by her own
22 admission, obtained and used the dangerous drug Augmentin by fraud, deceit, misrepresentation
23 or subterfuge. The circumstances are that Respondent obtained the Augmentin for her own use
24 by making a misrepresentation to hospital staff that the drug was for a patient.

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1 **FOURTH CAUSE FOR DISCIPLINE**

2 **(Criminal Conviction)**

3 15. Respondent is subject to discipline under Code section 2761, subdivision (f), in that
4 she was convicted of a crime substantially related to the qualifications, functions, and duties of a
5 registered nurse, as follows:

6 a. On or about December 21, 2009, in the criminal proceeding titled *People v. Deborah*
7 *Blaze* (Super Ct. Madera County, 2009, No. MCR035466), Respondent was convicted by the
8 Court on her plea of guilty to one felony count in violation of Health and Safety Code section
9 11373(a)(procuring a controlled substance by fraud and deceit in violation of law). The
10 circumstances of the crime are described in paragraph 12, above.

11 **MATTERS IN AGGRAVATION**

12 16. On or about August 9, 2006, Respondent enrolled in the Maximus Diversion
13 Program; however, Respondent was terminated from diversion on or about July 17, 2007, due to
14 noncompliance issues with her Nursing Support Group and random body fluid tests, which were
15 positive for alcohol on September 18, 2006, June 29, 2007, and July 5, 2007. Respondent is
16 considered a public safety risk.

17 **PRIOR DISCIPLINE**

18 17. Effective June 28, 1998, pursuant to the Stipulation, Decision and Order in Statement
19 of Issues Case No. 97-115, Respondent was issued Registered Nurse License No. 544432. The
20 license was immediately revoked; however the revocation was stayed and Respondent was placed
21 on probation for three (3) years with terms and conditions. The basis for the probationary license
22 was that between September 1989 and January 1995, Respondent was convicted of crimes
23 involving shoplifting, petty theft and petty theft with priors.

24 **PRAYER**

25 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
26 and that following the hearing, the Board of Registered Nursing issue a decision:

27 1. Revoking or suspending Registered Nurse License Number 544432, issued to
28 Deborah Kathleen Blaze;

1 2. Ordering Deborah Kathleen Blaze to pay the Board of Registered Nursing the
2 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
3 Professions Code section 125.3; and,

4 3. Taking such other and further action as deemed necessary and proper.
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7 DATED:

1/21/10

for

Stacie Bernum

LOUISE R. BAILEY, M.ED., RN
Interim Executive Office r
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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1 or in any action taken by or before any governmental body responsible for licensing or
2 disciplining licensees. Respondent's admissions are not admissible in any civil or criminal
3 action.

4 3. It is understood by respondent that, in deciding whether to adopt this
5 stipulation, the Board may receive oral and written communications from its staff and the
6 Attorney General's office. Communications pursuant to this paragraph shall not disqualify
7 the Board or other persons from future participation in this or any other matter affecting
8 respondent. In the event this settlement is not adopted by the Board, the stipulation will not
9 become effective and may not be used for any purpose, except for this paragraph, which
10 shall remain in effect.

11 4. Respondent agrees that: (1) the admissions made in the stipulation by
12 respondent constitute a proper and factual basis for issuance without the convening of any
13 administrative hearing and the introduction of oral and documentary evidence against
14 respondent; and (3) that the matters set forth in paragraphs numbered one through eleven are
15 true and correct.

16 5. Complainant Ruth Ann Terry, M.P.H., R.N., filed Statement of Issues
17 number 97-15 on June 18, 1996, in her official capacity as Executive Officer of the Board
18 and in no other capacity. Respondent filed a timely notice of defense in this matter.

19 6. REGISTRATION AND LICENSE INFORMATION

20 On August 9, 1996, respondent applied for Registered Nurse licensure under
21 the laws of the State of California. Respondent certified under penalty of perjury on July
22 29, 1996, that the information contained in the application was true and correct.
23 Respondent's official address of record is 300 Myer Drive, #13, Chowchilla, California,
24 93610.

25 7. Respondent's application is subject to denial under Business and
26 Professions Code section 2761(f) in the following respects:
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1 a. On September 29, 1989, respondent was convicted on her plea of guilty
2 for violating Penal Code section 490.5 (shoplifting), a misdemeanor. (*People v. Deborah*
3 *Kathleen Blaze*, Riverside Municipal Court case number 210938.) Such crime is
4 substantially related to the qualifications, functions or duties of a registered nurse as defined
5 in Title 16, California Code of Regulations, section 1444, in that such conduct evidences a
6 present or potential unfitness of respondent to perform the functions of a registered nurse in
7 a manner consistent with the public health, safety or welfare.

8 The circumstances surrounding the conviction are that on or about
9 September 15, 1988, respondent willfully and unlawfully did steal, take and carry away
10 personal property of another, of a value not exceeding \$400, to wit; Target, located in
11 Riverside, California.

12 b. On October 31, 1989, respondent was convicted on her plea of guilty
13 for violating Penal Code section 484/490.5 (petty theft/shoplifting), a misdemeanor. (*People*
14 *v. Deborah Kathleen Blaze*, case number 225808.) Such crime is substantially related to the
15 qualifications, functions or duties of a registered nurse as defined in Title 16, California
16 Code of Regulations, section 1444, in that such conduct evidences a present or potential
17 unfitness of respondent to perform the functions of a registered nurse in a manner consistent
18 with the public health, safety or welfare.

19 The circumstances surrounding the conviction are that on or about July 23,
20 1989, respondent willfully and unlawfully did steal, take, and carry away personal property
21 of another, or a value not exceeding \$400, to wit; Albertson's, located in Riverside,
22 California.

23 c. On January 18, 1995, in the Riverside Consolidated Superior/Municipal
24 Court (*People v. Deborah Kathleen Blaze*, Case Number CR60545), respondent was
25 convicted on her plea of guilty for violating Penal Code section 666 (petty theft with prior
26 convictions), a misdemeanor. Such crime is substantially related to the qualifications,
27 functions or duties of a registered nurse as defined in Title 16, California Code of

1 Regulations, section 1444, in that such conduct evidences a present or potential unfitness of
2 respondent to perform the functions of a registered nurse in a manner consistent with the
3 public health, safety or welfare.

4 The circumstances surrounding the conviction are that on or about
5 December 9, 1994, respondent willfully and unlawfully did steal, take, and carry away
6 personal property of another, to wit; Mervyns, located in Corona, California, and having
7 previously been convicted of petty theft.

8 8. Respondent's application is subject to denial under Business and
9 Professions Code section 480(a)(1) in that respondent has been convicted of crimes
10 substantially related to the qualifications, functions or duties of a registered nurse, as set
11 forth in paragraph 7, above.

12 9. Respondent's application is subject to denial under Business and
13 Professions Code section 480(a)(2) in that respondent has done acts involving dishonesty,
14 fraud or deceit, as set forth in paragraph 7, above.

15 10. Respondent's application is subject to denial under Business and
16 Professions Code section 480(a)(3) in that respondent has done acts which if done by a
17 licentiate would be grounds for suspension or revocation of the license, as set forth in
18 paragraph 7, above.

19 11. Respondent's application is subject to denial under Business and
20 Professions Code section 480(c) in that on or about July 29, 1996, she falsely represented
21 on her application for a registered nurse's license that she had not been convicted of any
22 offense other than minor traffic violations.

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1 ORDER

2 12. Based on the foregoing admissions, it is stipulated that the Board may
3 issue the following decision and order.

4 The application of respondent Blaze for licensure is hereby granted. Upon
5 successful completion of the licensure examination and all other licensing requirements, a
6 license shall be issued to respondent. Said license shall immediately be revoked, the order
7 of revocation stayed and respondent placed on probation for a period of three (3) years on
8 the following terms and conditions:

9 (1) OBEY ALL LAWS - Respondent shall obey all federal, state and local
10 laws, and all rules and regulations of the Board of Registered Nursing governing the practice
11 of nursing in California. A full and detailed account of any and all violations of law shall
12 be reported by the respondent to the Board in writing within seventy-two (72) hours of
13 occurrence. To permit monitoring of compliance with this term, respondent shall submit
14 completed fingerprint cards and fees within 45 days of the effective date of the decision,
15 unless previously submitted as part of the licensure application process.

16 (2) COMPLY WITH PROBATION PROGRAM - Respondent shall fully
17 comply with the terms and conditions of the Probation Program established by the Board and
18 cooperate with representatives of the Board in its monitoring and investigation of the
19 respondent's compliance with the Program. Respondent shall inform the Board in writing
20 within no more than 15 days of any address change and shall at all times maintain an active,
21 current license status with the Board, including during any period of suspension.

22 (3) REPORT IN PERSON - Respondent, during the period of probation,
23 shall appear in person at interviews/meetings as directed by the Board or its designated
24 representatives.

25 (4) ABSENCE FROM STATE - Periods of residency or practice outside
26 of California will not apply to the reduction of this probationary term. The respondent must
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1 provide written notice to the Board within 15 days of any change of residency or practice
2 outside the state.

3 (5) SUBMIT WRITTEN REPORTS - Respondent, during the period of
4 probation, shall submit such written reports/declarations and verification of actions under
5 penalty of perjury as are required. These declarations shall contain statements relative to
6 respondent's compliance with all the terms and conditions of the Board's Probation Program.
7 Respondent shall immediately execute all release of information forms as may be required
8 by the Board or its representatives.

9 (6) FUNCTION AS A REGISTERED NURSE - Respondent, during the
10 period of probation, shall engage in the practice of professional nursing in California for a
11 minimum of 24 hours per week (or as determined by the Board) for 6 consecutive months.
12 Per Section 2732 of the Business and Professions Code, no person shall engage in the
13 practice of registered nursing without holding a license which is in an active status.

14 (7) NURSING PRACTICE - The Board shall be informed of and approve
15 of each agency for which the respondent provides nursing services prior to respondent's
16 commencement of work. The respondent shall inform her employer of the reason for and
17 the terms and conditions of probation and shall provide a copy of the Board's decision and
18 order to her employer and immediate supervisor. The employer shall submit performance
19 evaluations and other reports as requested by the Board. Respondent is also required to
20 notify the Board in writing within seventy-two (72) hours after termination of any nursing
21 employment. Any notification of termination shall contain a full explanation of the
22 circumstances surrounding it.

23 (8) SUPERVISION - The Board shall be informed of and approve of the
24 level of supervision provided to the respondent while she is functioning as a registered nurse.
25 The appropriate level of supervision must be approved by the Board prior to commencement
26 of work. Respondent shall practice only under the direct supervision of a registered nurse
27 in good standing (no current discipline) with the Board of Registered Nursing.

1 (9) EMPLOYMENT LIMITATIONS - Respondent may not work for a
2 nurse registry; temporary nurse agency; home care agency; in-house nursing pool; as a
3 nursing supervisor; as a faculty member in an approved school of nursing; or as an instructor
4 in a Board approved continuing education program. Respondent must work only on
5 regularly assigned, identified and predetermined worksite(s) with appropriate supervision as
6 approved by the Board.

7 (10) COMPLETE A NURSING COURSE(S) - Respondent at her expense,
8 shall begin and successfully complete a course(s) in nursing as directed by the Board prior
9 to engaging in the practice of nursing and prior to the end of the probationary term.

10 The respondent may be suspended from practicing nursing until the necessary
11 coursework is completed. The content of such course(s) and the place and conditions of
12 instruction shall be specified by Board representatives at the time of the initial probation
13 meeting based on the nature of the violation(s). Specific courses must be approved prior to
14 enrollment. The respondent must submit written proof of enrollment and proof of successful
15 completion. Transcripts or certificates of completion must be mailed directly to the Board
16 by the agency or entity instructing the respondent.

17 Home study or correspondence courses are not acceptable and will not be
18 approved.

19 (11) VIOLATION OF PROBATION - If a respondent violates the conditions
20 of her probation, the Board after giving the respondent notice and an opportunity to be
21 heard, may set aside the stay order and impose the stayed discipline (revocation) of the
22 respondent's license.

23 If during the period of probation, an accusation or petition to revoke probation
24 has been filed against respondent's license or the Attorney General's Office has been
25 requested to prepare an accusation or petition to revoke probation against the respondent's
26 license, the probationary period shall automatically be extended and shall not expire until the
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1 accusation or petition has been acted upon by the Board. Upon successful completion of
2 probation, the respondent's license will be fully restored.

3 (12) MENTAL HEALTH EXAMINATION - The respondent shall, within
4 45 days of the effective date of this decision, have a mental health examination including
5 psychological testing as appropriate to determine her capability to perform the duties of a
6 registered nurse. The examination will be performed by a psychiatrist, psychologist or other
7 licensed mental health practitioner approved by the Board. The examining mental health
8 practitioner will submit a written report of that assessment and recommendations to the
9 Board. All costs are the responsibility of the respondent. Recommendations for treatment,
10 therapy or counseling made as a result of the mental health examination will be instituted and
11 followed by the respondent.

12 (13) THERAPY OR COUNSELING PROGRAM - Respondent, at her
13 expense, shall participate in an ongoing counseling program until such time as the Board
14 releases her from this requirement and only upon the recommendation of the counselor.
15 Written progress reports from the counselor will be required at various intervals.

16 DATED: February 3, 1998

17 Respectfully Submitted,

18 DANIEL E. LUNGREN
19 Attorney General of the State of California
20 JOEL S. PRIMES
21 Supervising Deputy Attorney General

22 
23 JUNE LAVERNE LONG
24 Deputy Attorney General

25 Attorneys for Complainant
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1 **WAIVER, ACKNOWLEDGEMENT AND AGREEMENT**

2 I have read the Stipulation, Decision and Order. I understand that I have a
3 right to a hearing on the charges contained in the captioned statement of issues, the right to
4 cross-examine witnesses and introduce evidence in mitigation at said hearing, and the right
5 to appeal from any adverse decision. I knowingly and intelligently waive all these rights and
6 I understand that by signing this stipulation and agreement I am agreeing that the Board of
7 Registered Nursing may impose disciplinary action against my licentiate certificate upon
8 issuance for acts which occurred based on my admissions to paragraphs one through eleven
9 of this Stipulation.

10 I understand the terms and ramifications of the Stipulation, Decision and Order
11 and I agree to be bound by all of its term and conditions.

12
13 DATED: 1-20-98

Deborah Kathleen Blaze
DEBORAH KATHLEEN BLAZE
Applicant/Respondent

1 **DECISION AND ORDER**

2 The foregoing Stipulation and Agreement is adopted as the Decision and Order
3 of the Board of Registered Nursing, Department of Consumer Affairs of the State of
4 California in the captioned matter, and shall become effective on the 28th day of
5 June _____, 1998.

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7 DATED: May 29, 1998


8 PRESIDENT
9 Board of Registered Nursing
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1 DANIEL E. LUNGREN, Attorney General
of the State of California
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Telephone: (916) 324-4618

6 Attorneys for Complainant
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9 BEFORE THE
10 BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
11 STATE OF CALIFORNIA

12 In the Matter of the Statement of)
Issues Against:)

NO. 97-115

13) STATEMENT OF ISSUES
14)
15)
16)
17)

14 DEBORAH KATHLEEN BLAZE)
300 Myer Drive #13)
15 Chowchilla, California 93610)
16)

17 Applicant/Respondent.)
18)

18 Ruth Ann Terry, M.P.H., R.N., for causes for denial of
19 Deborah Kathleen Blaze's application for licensure as a
20 registered nurse, alleges:
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22 1. Complainant Ruth Ann Terry, M.P.H., R.N., makes
23 and files this statement of issues in her official capacity as
24 Executive Officer, Board of Registered Nursing, Department of
25 Consumer Affairs.

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1 2. Under Business and Professions Code section 2736,
2 the Board of Registered Nursing may deny a license when it finds
3 that the applicant has committed any acts constituting grounds
4 for denial of licensure under section 480 of that code.

5 Under Business and Professions Code section 480, the
6 Board of Registered Nursing may deny a license when it finds that
7 the applicant has committed any act which, if done by a licensee,
8 would be grounds for discipline, has been convicted of a crime
9 substantially related to the qualifications, functions or duties
10 of a licensed registered nurse or has knowingly made a false
11 statement of fact required to be revealed on an application.

12 Under Business and Professions Code section 2761(e),
13 the Board of Registered Nursing may deny, suspend or revoke any
14 license if it finds that a licensee secured the license by making
15 or giving any false statement or information in connection with
16 the application.

17
18 3. On or about August 9, 1996, the Board of
19 Registered Nursing received an application for a registered nurse
20 license from Deborah Kathleen Blaze (hereinafter "respondent").
21 On July 29, 1996, Deborah Kathleen Blaze certified under penalty
22 of perjury that the information contained in the application was
23 true and correct.

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1 4. Grounds exist to deny respondent's application
2 under Business and Professions Code section 2761(f) in the
3 following respects:

4 a. On September 29, 1989, in the Riverside Municipal
5 Court (People vs. Deborah Kathleen Blaze, case number 210938),
6 respondent was convicted on her plea of guilty for violating
7 Penal Code section 490.5 (shoplifting), a misdemeanor. Such
8 crime is substantially related to the qualifications, functions
9 or duties of a registered nurse as defined in Title 16,
10 California Code of Regulations, section 1444, in that such
11 conduct evidences a present or potential unfitness of respondent
12 to perform the functions of a registered nurse in a manner
13 consistent with the public health, safety or welfare.

14 The circumstances surrounding the conviction are that
15 on or about September 15, 1988, respondent willfully and
16 unlawfully did steal, take, and carry away personal property of
17 another, of a value not exceeding \$400, to wit; Target, located
18 in Riverside, California.

19 b. On October 31, 1989, in the Riverside Municipal
20 Court (People vs. Deborah Kathleen Blaze, case number 225808),
21 respondent was convicted on her plea of guilty for violating
22 Penal Code section 484/490.5 (petty theft/shoplifting), a
23 misdemeanor. Such crime is substantially related to the
24 qualifications, functions or duties of a registered nurse as
25 defined in Title 16, California Code of Regulations, section
26 1444, in that such conduct evidences a present or potential
27 unfitness of respondent to perform the functions of a registered

1 nurse in a manner consistent with the public health, safety or
2 welfare.

3 The circumstances surrounding the conviction are that
4 on or about July 23, 1989, respondent willfully and unlawfully
5 did steal, take, and carry away personal property of another, of
6 a value not exceeding \$400, to wit; Albertson's, located in
7 Riverside, California.

8 c. On January 18, 1995, in the Riverside Consolidated
9 Superior/Municipal Court (People vs. Deborah Kathleen Blaze, case
10 number CR60545), respondent was convicted on her plea of guilty
11 for violating Penal Code section 666 (petty theft with prior
12 convictions), a misdemeanor. Such crime is substantially related
13 to the qualifications, functions or duties of a registered nurse
14 as defined in Title 16, California Code of Regulations, section
15 1444, in that such conduct evidences a present or potential
16 unfitness of respondent to perform the functions of a registered
17 nurse in a manner consistent with the public health, safety or
18 welfare.

19 The circumstances surrounding the conviction are that
20 on or about December 9, 1994, respondent willfully and unlawfully
21 did steal, take, and carry away personal property of another, to
22 wit; Mervyns, located in Corona, California, and having
23 previously been convicted of petty theft.

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1 5. Grounds exist to deny respondent's application
2 under Business and Professions Code section 480(a)(1) in that
3 respondent has been convicted of crimes substantially related to
4 the qualifications, functions or duties of a registered nurse, as
5 set forth in paragraph 4, above.

6
7 6. Grounds exist to deny respondent's application
8 under Business and Professions Code section 480(a)(2) in that
9 respondent has done acts involving dishonesty, fraud or deceit,
10 as set forth in paragraph 4, above.

11
12 7. Grounds exist to deny respondent's application
13 under Business and Professions Code section 480(a)(3) in that
14 respondent has done acts which if done by a licentiate would be
15 grounds for suspension or revocation of the license, as set forth
16 in paragraph 4, above.

17
18 8. Grounds exist to deny respondents's application
19 under Business and Professions Code section 480(c) in that on or
20 about July 29, 1996, she falsely represented on her application
21 for a registered nurse license that she had not been convicted of
22 any offense other than minor traffic violations.

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1 WHEREFORE, complainant prays that a hearing be held
2 and if the allegations set forth herein, or any of them are found
3 to be true, the application of Deborah Kathleen Blaze for
4 licensure as a registered nurse be denied.

5 DATED: 4/24/97

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7 
8 RUTH ANN TERRY, M.P.H., R.N.
9 Executive Officer
10 Board of Registered Nursing
11 Department of Consumer Affairs
12 State of California

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26 Complainant
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